

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

In re:	§	
	§	Chapter 11
Free Speech Systems LLC	§	
	§	Case No. 22–60043 (CML)
Debtor.	§	

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THE SANDY HOOK FAMILIES’ CORRECTED MOTION TO EXPEDITE  
MOTION TO (I) APPOINT TORT CLAIMANTS COMMITTEE AND (II) REMOVE  
THE DEBTOR IN POSSESSION

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This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.

**Expedited relief has been requested. If the Court considers the motion on an expedited basis, then you will have less than 21 days to answer. If you object to the requested relief or if you believe that the expedited consideration is not warranted, you should file an immediate response.**

**Represented parties should act through their attorney.**

TO THE HONORABLE CHRISTOPHER LOPEZ, UNITED STATES BANKRUPTCY JUDGE:

Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and Marcel Fontaine ( the “**Texas Plaintiffs**”) and David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi, Carlos M. Soto, Jillian Soto-Marino, William Aldenberg, William Sherlach, and Robert Parker (the “**Connecticut**”

**Plaintiffs**”) (together the “**Sandy Hook Families**”),<sup>1</sup> creditors and parties-in-interest moved to appoint a tort claimants’ committee and remove Free Speech Systems, LLC (“**FSS**” or “**Debtor**”) as debtor in possession. The Sandy Hook Families seek to expedite the motion filed at Docket No. 102 for the following reasons:

**EXPEDITED RELIEF**

1. A hearing is scheduled for September 13, 2022 at 1:00 p.m. to determine the use of cash collateral on a final basis. Many factual issues overlap between the cash collateral objections and the Sandy Hook Families’ request to appoint a committee and remove the Debtor in Possession. In light of the Court’s setting in September and in the interest of judicial economy, the Sandy Hook Families’ request expedited consideration and a hearing on September 13, 2022 at 1:00 p.m.

Date: August 26, 2022

Respectfully submitted,

**MCDOWELL HETHERINGTON LLP**

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***Counsel for the Texas Plaintiffs***

and

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<sup>1</sup> Marcel Fontaine was not defamed as to the Sandy Hook mass-shooting but as to the Parkland mass-shooting. For ease of reference, however, this objection refers to all tort claimants as the Sandy Hook Families.

**CHAMBERLAIN, HRDLICKA, WHITE,  
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***Bankruptcy Counsel for Connecticut Plaintiffs***

**CERTIFICATE OF SERVICE**

The undersigned certifies that on August 26, 2022, a true and correct copy of the foregoing Motion was served electronically on all parties registered to receive electronic notice of filings in this case via this Court's ECF notification system.

/s/ Jarrod B. Martin

Jarrod B. Martin

**BLR 9013-1(i) CERTIFICATE**

Pursuant to BLR 9013-1(i), I hereby certify that the information contained in the foregoing document with respect to the need for emergency relief is accurate, true, and correct to the best of my knowledge.

/s/ Jarrod B. Martin

Jarrod B. Martin